

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

ADJUSTACAM, LLC,

Plaintiff,

v.

AMAZON.COM, INC., *et al.*,

Defendants.

Case No. 6:10-cv-00329-LED

JURY TRIAL DEMANDED

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO COMPLY WITH
PARAGRAPH 1 OF THE PARTIES' PROPOSED DISCOVERY ORDER AND SERVE
INITIAL DISCLOSURES**

I.

Defendant Amazon.com, Inc. (“Amazon”) moves the Court to extend the time within which it is required to serve Initial Disclosures pursuant to the parties’ Proposed Discovery Order (Dkt. No. 429) up to and including May 27, 2011.

II.

The proposed deadline to serve initial disclosures is May 20, 2011. Amazon respectfully request that this deadline be extended to and including May 27, 2011. Plaintiff Adjustacam, LLC is not opposed to this request

III.

Amazon seeks this extension of time not for delay, but for good cause so that justice may be served.

WHEREFORE, Amazon.com, Inc. respectfully requests that the time to serve its Initial Disclosures pursuant to the parties' Proposed Discovery Order, be extended to and including May 27, 2011.

Dated: May 23, 2011

Respectfully submitted,

By: /s/ Brian Craft
Brian Craft
State Bar No. 04972020
Eric H. Findlay
State Bar No. 00789886
FINDLAY CRAFT, LLP
6760 Old Jacksonville Highway,
Suite 101
Tyler, TX 75703
Phone: (903) 534-1100
Fax: (903) 534-1137
Email: efindlay@findlaycraft.com
Email: bcraft@findlaycraft.com
James E. Geringer (admitted *pro hac
vice*)
james.geringer@klarquist.com
Salumeh R. Loesch , OR State Bar
No. 090074
salumeh.loesch@klarquist.com
KLARQUIST SPARKMAN, LLP
121 S.W. Salmon Street, Suite 1600
Portland, Oregon 97204
Telephone: (503) 595-5300
Facsimile: (503) 595-5301

ATTORNEYS FOR DEFENDANT
AMAZON.COM, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that counsel of record who are deemed to have consented to electronic service are being served with a copy of this **UNOPPOSED MOTION FOR EXTENSION OF TIME TO COMPLY WITH PARAGRAPH 1 OF THE COURT'S DISCOVERY ORDER AND SERVE INITIAL DISCLOSURES**, *via* the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 23rd day of May 2011.

/s/ Brian Craft
Brian Craft